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August 15, 2014

By ECF

Hon. Eric N. Vitaliano
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201
Attn.: William Villanueva, Courtroom Deputy

Re: *United States v. Discala, et al.*, CR-14-399 (ENV)
(Defendant Shapiro's Travel Application on Consent)

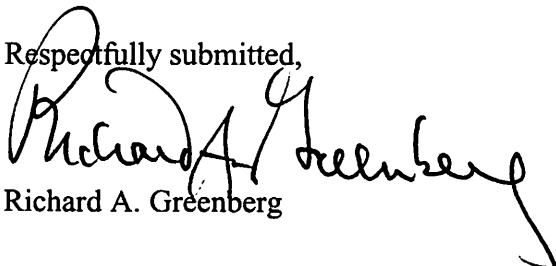
Dear Judge Vitaliano:

I am counsel to David Gourevitch, attorney of record for Ira Shapiro, one of the defendants in the above-entitled matter. With the consent of the government (AUSA Paes) and Mr. Shapiro's Pre-Trial Services Officer (Vincent Adams, 914-390-4139), I am writing to request Your Honor's approval of two minor changes in Mr. Shapiro's geographic bail restrictions which currently limit him to the Southern and Eastern Districts of New York.

1. **District of New Jersey.** Mr. Shapiro lives in Rockland County on the New Jersey line. He requests the Court's permission to travel to and through the District of New Jersey to shop or to take a more direct route when driving to and from New York City, i.e., across the George Washington Bridge.
2. **Family Reunion in Massachusetts.** Mr. Shapiro requests the Court's permission to accompany his wife and children to a long planned family reunion in Andover, Mass., during the four day period August 17-20, 2014, staying at the Homewood Suites in Andover.

Thank your for your consideration of this application.

Respectfully submitted,


Richard A. Greenberg

cc.: AUSA Shannon Jones (by email)
PTSO Victor Adams (by email)